



Lawrence Berkeley National Laboratory

Via email and certified mail

Receipt No. 7009 2820 0004 4632 9482

Reference No.: ES-16-028

November 18, 2015

Ms. Carmen Santos and Mr. Steve Armann
US Environmental Protection Agency, Pacific Southwest, Region 9
Land Division (LND-4-1)
75 Hawthorne Street
San Francisco, CA 94105

**Subject: Request for Extension of Time Limit for Storage of PCB Bulk Product Waste
Generated from Buildings 16 and 16A at the Old Town Project Area**

Ms. Santos and Mr. Armann,

The purpose of this letter is to request an extension of 60 days in addition to the 30 days allowed per 761.65 (c)(1) of Title 40 of the Code of Federal Regulations (CFR) for temporary storage of polychlorinated biphenyl (PCB) waste. The request pertains to PCB bulk product waste generated from Buildings 16 and 16A at Lawrence Berkeley National Laboratory's (LBNL's) Old Town Project area. Your approval of this request would allow for temporary on-site storage of this waste for a total of 90 days from the time of generation of each waste stream.

Waste Classification

As previously discussed with the Environmental Protection Agency (EPA) and documented in the Old Town Demolition Project meeting notes, PCBs at concentrations greater than 50 milligrams per kilogram (mg/kg) were detected in samples of: paint in Rooms 109 and 138; mastic in Rooms 138B and 110 of Building 16; and insulation and tape in Building 16A. LBNL reviewed the sample data, considered the age, historical uses of the rooms with no record of spills, as well as available information about PCB concentration ranges in similar building materials, and concluded that the data are not indicative of a spill or release of PCB-containing oils. Consequently, LBNL will designate the building materials from which the samples were collected as PCB bulk product waste and hazardous waste per Title 22 of the California Code of Regulations (CCR).

Waste Packaging

The PCB bulk product waste from Building 16 is being segregated from excluded PCB materials such as paint with less than 50 mg/kg of PCBs and non-PCB containing demolition waste. All wood trim painted with the PCB-containing paint was removed from Room 138 on October 29, 2015 and will be disposed of with the paint, as it is too difficult to separate the paint from the trim. The mastic in Room 138B was removed from the floor and separated from the floor tiles on November 11, 2015. The insulation and tape were removed from Building 16A on November 18, 2015. The paint in Room 109 will be scabbled off the concrete floor once analytical results of PCBs in the concrete are received, which will inform a decision whether to remove a layer of concrete along with the paint.

LBNL's demolition subcontractor Dynamic Management Solutions, LLC (DMS) has placed the PCB bulk product waste from Building 16 in sealed bags which are then placed in containers compliant with the Department of Transportation's (DOT) requirements for transportation of PCB solids. These are anticipated to be three to five 55-gallon drums (removable head, UN 1A2, Steel Drums per 49 CFR Section 178.504(a)(2)). The containers will be closed in accordance with the manufacturer's instructions provided pursuant to 49 CFR, Section 178.2 (c), and labeled as required per the Toxic Substances Control Act (TSCA) with the date the PCB bulk product was removed from service and a hazardous waste label per Title 22 CCR.

The PCB-containing insulation and tape from Building 16A have been segregated from other demolition waste packaged in bags, sealed, and will be placed in 90-cubic foot B-25 containers. B-25 containers meet the general requirements for packaging and packages for hazardous materials of 49 CFR Section 173.24 as well as the design requirements of Sections 173.410, and 173.411(A)(B)(1) for Type I Industrial Packaging. The containers are constructed of 12-gauge low-carbon steel, the interior and exterior is primed, and the exterior is painted. See Enclosure 3 for a description of the container and certifications of compliance with the DOT's requirements for hazardous waste packaging. It is anticipated that a minimum of four containers will be needed.

Temporary Storage Protective Measures

The packaged PCB bulk product waste will be stored on the LBNL site in a waste accumulation area designated for temporary storage of hazardous waste from Old Town, as shown in Enclosure 1. To protect them from the elements, drums will be placed inside an intermodal shipping container (shown in Enclosure 2) in the waste accumulation area. The waste accumulation area is paved and fenced, and only trained workers are allowed access. Inspections of the area and the waste containers stored therein are conducted on a weekly basis to ensure that all containers are in good condition and that spill response and emergency equipment are properly staged for use, if needed. All inspections are documented.

Storm drains around the area are protected with filter fabric and the area is swept as needed to prevent accumulation of sediment.

Basis for Request of Extension of the Temporary Storage Period

DMS began demolition of building components in Building 16 on October 29, 2015 (wood trim) and in Building 16A (insulation and tape) on November 18, 2015. DMS will scabble the paint in Room 109 as soon as it can be determined whether the concrete will be removed along with the paint. To allow efficient waste consolidation and shipment of PCB waste in as few shipments as practicable, LBNL is requesting an extension of 60 days in addition to the 30-day temporary storage limit for appropriately packaged non-liquid PCB waste set forth in Section 761.65 (c)(1) of 40 CFR.

LBNL requests that the EPA allow temporary storage of the packaged non-liquid PCB bulk product waste for a total of 90 days from the dates of generation of each package, (*i.e.*, until January 27, 2016 for waste generated on October 29, 2015; and beyond January 2016 for the mastic, insulation, tape, and red paint waste). Per Section 761.62 (c) "any person wishing to [...] store PCB bulk product waste in a manner other than prescribed in Section 761.65, must apply in writing to the EPA Regional Administrator" and must provide "information indicating that,

based on technical, environmental, or waste-specific characteristics or considerations, the proposed [...] storage methods or locations will not pose an unreasonable risk of injury to health or the environment."

As described above, storage of the non-liquid PCB bulk product waste in sealed and properly labeled containers will prevent any potential releases of the waste to the environment. Drums will be further protected by being placed inside an intermodal container, which will be maintained closed. Regular inspections of the storage area will ensure that the containers remain sealed and in good condition while in the waste accumulation area. Consequently, storage of the waste for an additional 60 days will not pose an unreasonable risk of injury to health or the environment.

LBNL appreciates your consideration of this request and respectfully requests a response by November 27, 2015 to ensure that compliance with all storage regulations is maintained. If no response is received by this date, DMS will arrange for shipment of waste already generated for off-site disposal.

If you have any questions or require additional information, please contact Ron Pauer at ropauer@lbl.gov or 510-486-7614 or me at rdcronin@lbl.gov or 510-495-2849.

Sincerely,



Robert Cronin
Project Director
Old Town Demolition Project

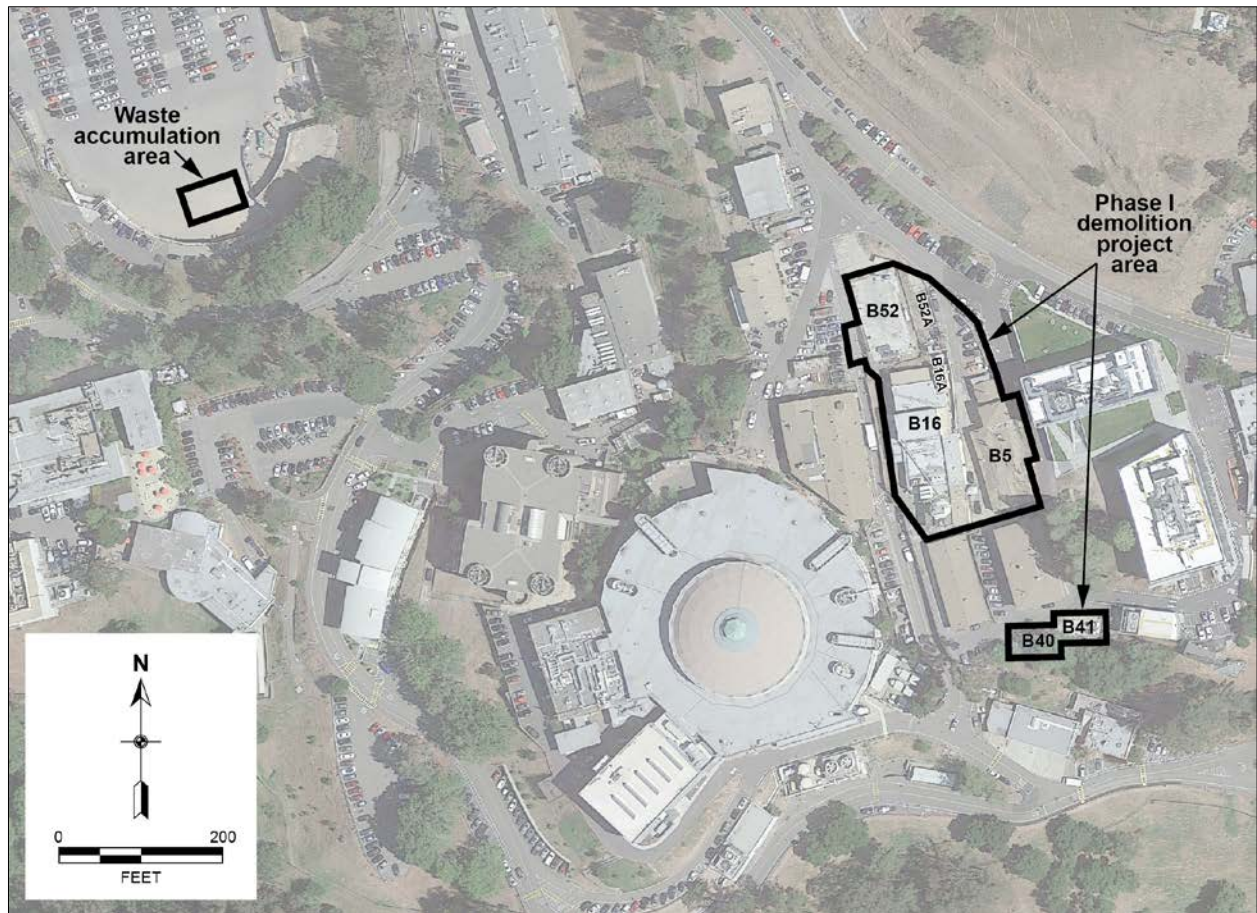
enclosures:

1. Location of Old Town Demolition Project Waste Accumulation Area
2. Intermodal Shipping Containers
3. B-25 Container Product Description:
 - Lingo Product Sheet for B-25 Container
 - Lingo Manufacturing Company Container Certification
 - Lingo Manufacturing Certificate of Conformance

cc via email:

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Enclosure 1.

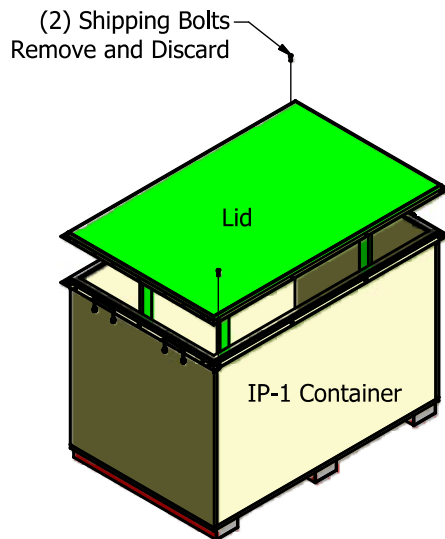
Location of Old Town Demolition Project Waste Accumulation Area



Enclosure 2.
Intermodal Shipping Containers

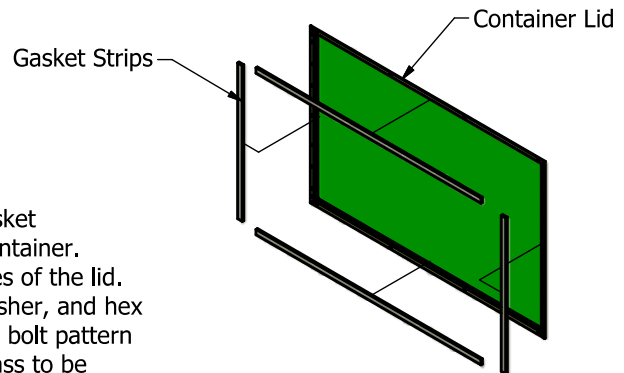
Enclosure 3. B-25 Container Product Description

	0005-IP1 Rev-B	IP-1 Container	Sheet 1 of 1	11/1/2010
	Lingo Manufacturing Co. 7400 Industrial Rd. Florence, Ky 41042 1-800-354-9771		Author: A. Danzl	

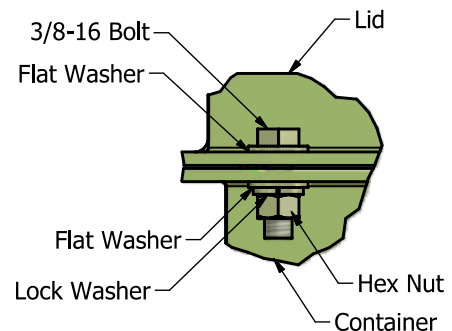
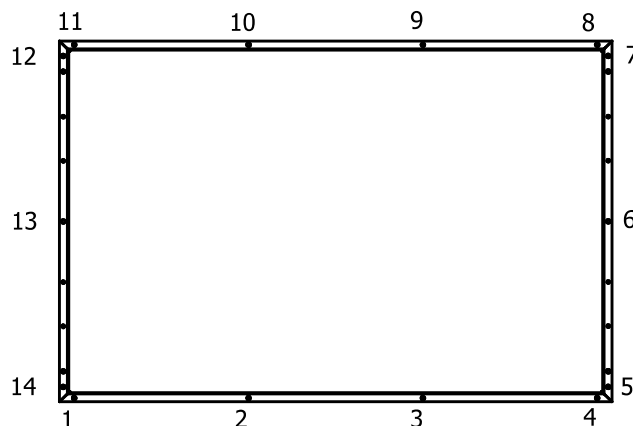


Step 1: Remove and discard shipping bolts

Step 2: Remove Lid and set on its top using 2 persons for safety. Wipe all the dust from the inside edges of the lid to maximize adhesion of gasket material. Select the 20 Ft roll of gasket material placed inside the container for shipment. Cut (2) Pieces 72 1/4" Long and (2) pieces 43 1/4" Long. Remove protective tape to expose the adhesive surface. With a helper - apply the (2) longest strips first. Apply (2) remaining strips - make sure there are no gaps in the joints to assure secure containment.



Step 3: With a helper - lift the lid with the gasket material in place and set carefully on top of container. Install 3/8 Bolt with flat washer to the top holes of the lid. Bottom of bolt will have a flat washer, lock washer, and hex nut as shown. Install all bolts in order with the bolt pattern shown. First pass to be finger tight and 2nd pass to be torqued to 38 Ft lbs with a torque wrench. NOTE: Torque pattern must be followed as shown to assure proper containment.



Enclosure 3. B-25 Container Product Description



A Subsidiary of Perma-Fix Environmental Services

MEMORANDUM

Engineering

TO: File – LINGO Manufacturing Co., Inc. Container Certification
FROM: Brad Foust
DATE: September 22, 2010
SUBJECT: Engineering Evaluation of DOT IP-1 (manufactured by LINGO)
Refs: (a) DOE/NV-325, Rev. 8 September 2010 Section 3.2.5 "Strength"
(b) Productive Engineering Inc. Container Analysis – IP-1 Structural Analysis Report Rev. 2, Submitted 30DEC09 (Project: 131-531)

1. M&EC requested LINGO Manufacturing Company, Inc. (LINGO) provide 90 cu. ft. DOT IP-1 carbon steel containers (drawing # 25008 Rev. C) with internal structural support and bolted lid closures. To comply with the engineering design requirements per Ref. (a), the supplied finite element analysis (FEA) of uniform loading by Productive Engineering Inc., Ref. (b), have been completed and reviewed by M&EC.
2. In my professional judgment, the manufacturer's drawing package and engineering analysis verify that the packaging design meets the Ref (a) strength requirements and illustrates the ability of the packaging and its contents to support a uniformly distributed load of 16,477 kg/m².

Provided by:

A handwritten signature in black ink, appearing to be "B. Foust", written over a horizontal line.

Date:

9/22/10

Brad Foust (Facility Staff Engineer)

Concur:

A handwritten signature in black ink, appearing to be "Connie Jones", written over a horizontal line.
Connie Jones (WCO)

Date:

9/23/2010

Enclosure 3. B-25 Container Product Description



Lingo Manufacturing Company, Inc.
7400 Industrial Road
Florence, KY 41042
800-354-9711
Fax: 859-371-0283
www.lingomfg.com/metalfab

CERTIFICATE OF CONFORMANCE

Customer: Material & Energy Company

Purchase Order Number: 753435

Specification Drawing: 25008 Rev C

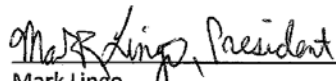
Container Specification: Type IP-1

Serial Number's: 0533 through 0560

Quantity: 28

Lingo Manufacturing Company Inc. certifies that a designated inspector or the Quality Assurance Manager has inspected the above product and that it meets or exceeds the quality requirements identified in the above Purchase Order, Specification and Lingo Mfg's Quality Assurance Program.

The product specified above complies with U.S. DOT 49CFR173.24, 173.410 and 173.411(A)(B)(1).



Mark Lingo
Quality Assurance Manager

Date: 4/29/15

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